

EXHIBIT C

Subject: RE: Alter - 5/3 meet-and-confer
Date: Wednesday, May 15, 2024 at 5:13:14 PM Eastern Daylight Time
From: Burgoon, Emma Z. (via Alter-AI-TT list)
To: Charlotte Lepic, OpenAIcopyrightlitigation.lwteam@lw.com, OpenAICopyright
CC: Alter-AI-TT@simplelists.susmangodfrey.com, KVPOAI@keker.com
Attachments: image001.png

EXTERNAL Email

Charlotte,

We're working on a detailed response to your last email, but wanted to respond on search terms (#6) in the interim. As an initial matter, we don't believe we firmly committed to providing search terms for the specified RFPs by April 29. Regardless, as your May 6 email acknowledges, the parties are now discussing a global exchange of search terms and custodians. In light of that, we don't think trying to negotiate search terms piecemeal is likely to be productive or efficient. We will provide all of our search terms at once, including the terms for RFP Nos. 21, 22, 23, & 26. We are discussing whether May 24 will work as an exchange date and will get back to you.

Best,

Emma

Emma Z. Burgoon (she/her/hers)

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